NEW MEXICO
ENVIRONMENT DEPARTMENT

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RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

Certified Mail - Return Receipt Requested

July 22, 2016

Ms. Judy B. LeDoux, Mayor
Village of Cimarron
Post Office Box 654
Cimarron, New Mexico 87714

RE: Minor Municipal, SIC 4952, NPDES Compliance Evaluation Inspection, Village of Cimarron Wastewater Treatment Plant, NM0031038, July 7, 2016

Dear Ms. LeDoux:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Racquel Douglas
US Environmental Protection Agency, Region VI
Enforcement Branch (6EN-WM)
Fountain Place
1445 Ross Avenue
Dallas, Texas 75202-2733

Bruce Yurdin
New Mexico Environment Department
Surface Water Quality Bureau
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

If you have any questions about this inspection report, please contact Sandra Gabaldon at (505) 827-1041 or at sandra.gabaldon@state.nm.us.

Sincerely,
/s/ Bruce J. Yurdin

Bruce J. Yurdin
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Racquel Douglas, USEPA (6EN-WM) by e-mail
Gladys Gooden-Jackson (6EN-WC) by e-mail
Brent Larsen, USEPA (6WQ-PP) by e-mail

NMED District II, Robert Italiano, Manager, by e-mail

EPA

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 N 2 5 3	N M 0 0 3 1 0 3 8 11	12 1 6 0 7 0 7 17	18 C	19 S 20	1

Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved
67 1 69	70 1	71 N 72	N 73 74 75	80

MINOR

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*
CIMMARON WASTEWATER TREATMENT PLANT –
I-25 North to Exit 419 towards Cimarron on NM 58. Travel approximately 18.9 miles to US 64 (10th Street), turn right to village offices. The WWTP is approximately ¼ of a mile from the village offices on US 64.
COLFAX COUNTY

Entry Time /Date	Permit Effective Date
1300 Hours / July 7, 2016	November 11, 2015
Exit Time/Date	**Permit Expiration Date**
1520 Hours / July 7, 2016	October 31, 2020

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
Mindy Cahill, Village Clerk-Administrator, (575) 376-2232/ (575)376-2810 Fax / (575) 643-6172 Cell
Damian Casias, Village Maintenance Supervisor, (575)376-2232

Other Facility Data
N. 36°30'28"
W. -104° 53'45"

Name, Address of Responsible Official/Title/Phone and Fax Number
Judy B. LeDoux, Mayor, (575) 376-2232
Post Office Box 654
Cimarron, NM 87714-0654

Contacted: Yes [ ] No [*]

SIC: 4952

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	U	Flow Measurement	U	Operations & Maintenance	N	CSO/SSO
U	Records/Reports	U	Self-Monitoring Program	U	Sludge Handling/Disposal	N	Pollution Prevention
U	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	U	Laboratory	N	Storm Water		Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Please see checklist and further explanations for details of findings

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
/s/ Sandra Gabaldon **Sandra Gabaldon**	NMED/SWQB/(505) 827-1041/(505) 827-0160	07/22/2016
Signature of Management QA Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
/s/ Bruce J. Yurdin **for** **Jennifer Foote, Municipal Team Lead**	NMED/SWQB/(505) 827-0596/(505) 827-0160	07/22/2016

EPA Form 3560-3 (Rev. 9-94) Previous editions are obsolete.

VILLAGE OF CIMARRON	PERMIT NO. NM0031038

SECTION A – PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS ¨ S ¨ M ¨ U ¨ NA (*FURTHER EXPLANATION ATTACHED NO)*

DETAILS:

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE	X Y ¨ N ¨ NA
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES	O Y ¨ N X NA
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT	X Y ¨ N ¨ NA
4. ALL DISCHARGES ARE PERMITTED	X Y ¨ N ¨ NA

SECTION B – RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. O S ¨ M ¨ U ¨ NA (*FURTHER EXPLANATION ATTACHED YES)*

DETAILS:

1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.	¨ Y X N ¨ NA
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.	O S ¨ M X U ¨ NA
a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING	O Y X N ¨ NA
b) NAME OF INDIVIDUAL PERFORMING SAMPLING	O Y X N ¨ NA
c) ANALYTICAL METHODS AND TECHNIQUES.	O Y X N ¨ NA
d) RESULTS OF ANALYSES AND CALIBRATIONS.	O Y X N ¨ NA
e) DATES AND TIMES OF ANALYSES.	O Y X N ¨ NA
f) NAME OF PERSON(S) PERFORMING ANALYSES.	O Y X N ¨ NA
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.	O S ¨ M X U ¨ NA
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.	O S ¨ M X U ¨ NA
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.	O Y X N ¨ NA

SECTION C – OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. ¨ S ¨ M X U ¨ NA *(FURTHER EXPLANATION ATTACHED YES)*

DETAILS: Lagoons

1. TREATMENT UNITS PROPERLY OPERATED.	¨ S ¨ M X U ¨ NA
2. TREATMENT UNITS PROPERLY MAINTAINED.	¨ S ¨ M X U ¨ NA
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED .	O S ¨ M O U X NA
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	O S ¨ M O U X NA
5. ALL NEEDED TREATMENT UNITS IN SERVICE	¨ S ¨ M X U ¨ NA
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.	¨ S ¨ M X U ¨ NA
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.	O S ¨ M ¨ U X NA
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.	O Y X N ¨ NA
STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.	X Y O N ¨ NA
PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.	O Y X N ¨ NA

VILLAGE OF CIMARRON	PERMIT NO. NM0031038

SECTION C – OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR?	X Y ¨ N ¨ NA
IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED?	O Y X N ¨ NA
HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?	O Y O N X NA
10.HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT?	¨ Y X N ¨ NA
IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?	¨ Y ¨ N X NA

SECTION D – SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. ¨ S ¨ M X U ¨ NA *(FURTHER EXPLANATION ATTACHED YES).*
DETAILS:

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.	O Y X N ¨ NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	X Y ¨ N ¨ NA
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.	X Y ¨ N ¨ NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.	O Y X N ¨ NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.	O Y X N ¨ NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE	O Y X N ¨ NA
a) SAMPLES REFRIGERATED DURING COMPOSITING. WET Testing performed 1/6 months. Samples not obtained	O Y X N ¨ NA
b) PROPER PRESERVATION TECHNIQUES USED. No testing performed on permit parameters. Discharge occurred September 2015.	O Y X N ¨ NA
c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.	O Y ¨ N X NA
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?	O Y ¨ N X NA

SECTION E – FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. O S ¨ M X U ¨ NA *(FURTHER EXPLANATION ATTACHED YES)*
DETAILS: The lagoons are overgrown with weeks, access to the outfall was inaccessible during the inspection. Please see inspection report for further details.

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. TYPE OF DEVICE: Parshall Flume	O Y X N ¨ NA
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.	O Y X N ¨ NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.	O Y X N ¨ NA
4. CALIBRATION FREQUENCY ADEQUATE.	O Y X N ¨ NA
RECORDS MAINTAINED OF CALIBRATION PROCEDURES.	O Y X N ¨ NA
CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.	O Y X N ¨ NA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE. No discharge during inspection.	O Y ¨ N X NA
6. HEAD MEASURED AT PROPER LOCATION. Parshall flume was not observed. **Unknown** if head measured at proper location.	O Y ¨ N ¨ NA
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.	¨ Y X N ¨ NA

SECTION F – LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. O S ¨ M X U ¨ NA *(FURTHER EXPLANATION ATTACHED YES)*
DETAILS:

1. EPA APPROVED ANALYTICAL PROCEDURES USED *(40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)*	X Y ¨ N ¨ NA

VILLAGE OF CIMARRON	PERMIT NO. NM0031038

SECTION F - LABORATORY (CONT'D)

2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED ¨ Y ¨ N X NA

3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. O S O M X U ¨ NA

4. QUALITY CONTROL PROCEDURES ADEQUATE. O S ¨ M X U ¨ NA

5. DUPLICATE SAMPLES ARE ANALYZED. 0 % OF THE TIME. O Y X N ¨ NA

6. SPIKED SAMPLES ARE ANALYZED. 0 % OF THE TIME. ¨ Y X N O NA

7. COMMERCIAL LABORATORY USED. X Y ¨ N ¨ NA

LAB NAME Bio-Aquatic Testing, Inc.

LAB ADDRESS 501 Mayes Road; Suite 100; Carrollton, TX 75006

PARAMETERS PERFORMED Biomonitoring (WET) testing

SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. O S ¨ M O U ¨ NA *(FURTHER EXPLANATION ATTACHED YES).*

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	

RECEIVING WATER OBSERVATIONS The outfall / receiving water was inaccessible due to overgrowth of vegegtation.

The facility was not discharging during inspection. Last discharge was in September 2015.

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. O S ¨ M X U ¨ NA *(FURTHER EXPLANATION ATTACHED YES).*
DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. O S ¨ M X U ¨ NA

2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. O S ¨ M ¨ U X NA

3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: N/A (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

SECTION I - SAMPLING INSPECTION PROCEDURES *(FURTHER EXPLANATION ATTACHED).*

1. SAMPLES OBTAINED THIS INSPECTION. ¨ Y X N ¨ NA

2. TYPE OF SAMPLE OBTAINED

GRAB _____ COMPOSITE SAMPLE ___ METHOD _____ FREQUENCY

3. SAMPLES PRESERVED. ¨ Y ¨ N ¨ NA

4. FLOW PROPORTIONED SAMPLES OBTAINED. ¨ Y ¨ N ¨ NA

5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE. ¨ Y ¨ N ¨ NA

6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE. ¨ Y ¨ N ¨ NA

7. SAMPLE SPLIT WITH PERMITTEE. ¨ Y ¨ N ¨ NA

8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED. ¨ Y ¨ N ¨ NA

9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT. ¨ Y ¨ N ¨ NA

Village of Cimarron
NPDES Permit No. NM0031038
Compliance Evaluation Inspection
Date of Inspection: July 7, 2016

Introduction:

On July 7, Sandra Gabaldón and Daniel Valenta of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the Village of Cimarron Wastewater Treatment Plant (WWTP). The Village of Cimarron WWTP has a design flow capacity of 0.0083 MGD (million gallons per day) and is classified as a minor municipal discharger under the federal Clean Water Act, Section 402, of the National Pollutant Discharge Elimination System (NPDES) permit program. It is assigned NPDES permit number NM0031038. This permit regulates the WWTP point source discharge to French Lake with a hydro link to Ponil Creek, thence to the Canadian River in Segment 20.6.4.306, *Standards for Interstate and Intrastate Surface Waters* 20.6.4 NMAC. The designated uses of this segment include: Irrigation, warmwater aquatic life, livestock watering, wildlife habitat and primary contact.

The NMED performs a certain number of CEIs for the U.S. Environmental Protection Agency (USEPA), Region VI, under the NPDES permit program, in accordance with the federal Clean Water Act. USEPA uses these inspections to determine compliance with the NPDES permit program. This inspection report is based on information provided by the permittee's representatives, observations made by the NMED inspector, and records and reports kept by the permittee and/or NMED.

Upon arrival at the Village of Cimarron Administrative Offices at approximately 1300 hours, the inspectors met Mr. Damian Casias, Maintenance Supervisor (Certified Operator, Level 1) and then with Ms. Mindy Cahill, Village Administrative Clerk. During the entrance interview, the inspector presented her credentials, made introductions and explained the purpose of the inspection. A review of records from previous discharges was done prior to touring the lagoon system. However, the permittee failed to provide any analytical data for their latest discharge in September 2015. The operator, Mr. Casias, did not locate any laboratory data and only provided data from their WET testing which was completed in 2013. The permit has been renewed and has been effective since 2015. The permittee is required to sample and analyze the parameters in Part I.Section A. for any discharge to French Lake.

A tour of the facility commenced after review of records and discussion regarding the newly issued permit. Mr. Casias accompanied the inspectors to the WWTP. The inspectors attempted to locate the outfall, but overgrown vegetation precluded the ability to do so.

Treatment Scheme:

The Village of Cimarron WWTP serves a population of approximately 1,000 people according to the US Census.

The Village of Cimarron's WWTP is approximately 60 years old. Raw sewage flows by gravity through the collection system, which has a combination of clay and PVC piping. The Village has one lift station located on the south side of town which helps bring influent to the WWTP. The raw influent enters the plant through a 4" Parshall flume where a wooden stick is used as a staff gauge to measure influent flow. The raw influent is then split and enters two lagoon ponds. Both lagoons have Solar Bees for mixing. The Solar Bees are affixed to the center of the ponds, which provides mixing only in the immediate area of their location. The lagoons are approximately 1-2 acres in size and are followed by two sand filter ponds prior to discharge through an approximate 6" Parshall flume (according to previous reports). The discharge enters French Lake, a privately owned lake on the Vermejo Ranch. The Vermejo ranch has asked that the WWTP no longer discharge to their lake and this may cause issues for the WWTP in the future if they can no longer discharge at their current location. The WWTP discharges approximately two times a year, the last discharge occurred in September 2015.

The lagoons have cemented lined freeboard areas with a clay base. Again, these were constructed approximately 60 years ago and are in desperate need of rehabilitation. The two sand filter ponds are clogged and filled with effluent. These are no longer functional as sand filters.

Currently, the lagoons have approximately two feet of freeboard and a discharge is inevitable at this time.

Sludge Management:

It appears that sludge has never been dredged from either lagoon. The Village does not currently have a sludge plan in place. The Village previously stated they may amend a ranch nearby with the sludge, but this would require further testing as well as approval by the Ground Water Quality Bureau.

Further Explanations:

Note: The sections are arranged according to the format of the enclosed EPA Inspection Checklist (Form 3560-3), rather than being ranked in order of importance.

Section A - Permit Verification:

This is only a comment:

On review of the permit issued on November 1, 2015 with expiration date of October 31, 2020:

In Part I – Requirements of NPDES Permits, Section A. Limitations and Monitoring Requirements, the permit states that Flow shall be monitored at a frequency of once per week with a sample type of "grab". This may be a typographical error and may require a minor modification be made to the permit to reflect either "instantaneous" or "continuous" flow sample type. (It is my understanding that this flow is "instantaneous" as it is discharged approximately twice a year.)

Section B – Recordkeeping and Reporting – Overall Rating of "Unsatisfactory"

The permit requires, in part III.C.4, Records Contents:

> *Records of monitoring information shall include:*
> *a. The date, exact place, and time of sampling or measurements;*
> *b. The individual(s) who performed the sampling or measurements;*
> *c. The date(s) and time(s) analyses were performed;*
> *d. The individual(s) who performed the analyses;*
> *e. The analytical techniques or methods used; and*
> *f. The results of such analyses.*

The permit requires, in Part I, Section C, Monitoring and Reporting:

> *Monitoring results must be reported to EPA on either the electronic or paper Discharge Monitoring Report (DMR) approved formats. Monitoring results can be submitted electronically in lieu of paper DMR form. To submit electronically, access the NetDMR at EPA'swebsite and contact the R6NetDMR@epa.gov in-box for further instructions. Until you are approved for NetDMR, you must report on the Discharge Monitoring Report (DMR) form No. 3320-1 in accordance witht eh "general Instructions" provided on the form.**
>
> ***Note*:** *The final rule on NetDMR reporting was published in the Federal Register (80 FR 64063) in October 2015. DMR forms are now required to be submitted electronically through NetDMR.*

The permit requires, in Part I, Section F. Copy of DMR Reports:

> *The permittee shall send a copy of DMRs, all other reports required in the permit…*
>
> *US Fish and Wildlife Service Field Office Supervisor*
> *New Mexico Ecological Services Field Office*
> *2105 Osuna NE*
> *Albuquerque, NM 87113*
>
> *And*
>
> *Compliance Assurance and Enforcement Division*
> *EPA Water Enforcement Branch (6EN-W)*
> *US Environmental Protection Agency, Region 6*
> *1445 Ross Avenue*
> *Dallas, TX 75202-2733*
>
> *And*
>
> *Program Manager*
> *Surface Water Quality Bureau*
> *Post Office Box 5469*
> *Santa Fe, NM 87502-0546*

Findings for Recordkeeping and Reporting:

Although this permittee discharges approximately two times a year, the permittee is required to submit DMRs each month, to include all parameters in Table 1, Table 2 and Table 3. The permittee has submitted DMRs for Table I, Table2, but has failed to submit DMRs for Table 3 (Whole Effluent Toxicity Testing) which is required to be monitored once every 6 months. The permit was issued in November 2015. It has now been greater than 6 months and no DMR has been submitted for WET testing.

The operator at the facility has failed to provide paperwork for any calibrations of the pH meter or the chlorine meter.

The permittee does not have plant records that include schedules, dates of maintenance or repair.

The permittee has failed to submit DMRs to the US Fish and Wildlife Services as required.

The permittee is reporting the concentration on the "Quantity or Loading" section of their DMRs. This is incorrect. The Village should use the appropriate loading for this box on their DMRs. The loading calculation that should be used is:

Concentration (mg/L) X 8.34 (constant) X flow in MGD (at the time of sample) = Loading

Section C – Operations and Maintenance – Overall Rating of "Unsatisfactory"

The permit requires in Part III, B.3 Proper Operation and Maintenance:

> a. *The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by permittee as efficiently as possible in a manner which will minimize upsets and discharges of excessive pollutants and in will achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of this permit.*
>
> b. *The permittee shall provide an adequate operating staff which is duly qualified to carry out operation, maintenance and testing functions required to insure compliance with the conditions of this permit.*

Findings for Operation and Maintenance:

Even a lagoon system needs an adequate staff to run the facility, conduct maintenance and laboratory analyses. The Village of Cimarron employs one Certified Level I operator. The Village should consider a second operator to help with the requirements of the permit.

The facility is approximately 60 years old and is in dire need of upgrades. The lagoons are filled to capacity and an imminent discharge will occur. The facility has overgrown vegetation, cracks in the cement, sand filters filled with effluent that no longer function as a filtering tool and an inability to measure the discharge effluent flow. These are all issues that need to be addressed. The facility was also told by the private landowner of French Lake that he no longer wants effluent discharged to the lake. This is a concern for NMED, as this facility may discharge in the upcoming months.

The two lagoons have a solar bee mixer anchored in the middle of each lagoon, which provides very little aeration and in turn provides very little treatment for organics or nutrients. The lagoons have a cement lined freeboard area and are clay lined. These lagoons present a very large environmental concern for groundwater since they were built in the 1950's. No groundwater studies were performed to understand the depth of the aquifer, the groundwater connectivity to other surface waters in the area, or any studies to verify that the clay lined lagoons indeed were appropriate for the area. There are borrowing rodents in the immediate area and may be causing further damage to the clay lined lagoons.

Again, the Village of Cimarron needs a new facility that can provide the treatment needed to avoid any discharges that may impair the Canadian River.

Lagoon banks are covered by vegetation. The lagoons must be kept free of vegetation to prevent liner damage. Trees must not be allowed to grow in either the base or banks of the lagoon. When toured by NMED, the inspectors were unable to observe the outfall due to overgrown vegetation. It is necessary to maintain the lagoons so the operator can capture samples from the discharge point when this facility discharges.

The Village of Cimarron experienced a sanitary sewer overflow that was never reported. It was explained to the Village Administrator along with the operator that every sanitary sewer overflow is required to be reported, either within 24-hours (eminent danger to health and environment) or on their DMRs, it there is no eminent danger to health or environment. (Part I, Section D. Overflow Reporting, NPDES Permit).

Section D – Self-Monitoring – Overall Rating of "Unsatisfactory"

The permit requires in Part III, C. 5 Monitoring Requirements:

a. *Monitoring must be conducted according to test procedures approved under 40 CFR 136, unless other test procedures have been specified in this permit or approved by the Regional Administrator.*

b. *The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instruments at intervals frequent enough to insure accuracy of measurements and shall maintain appropriate records of such activities.*

c. *An adequate analytical quality control program, including the analyses of sufficient standards, spikes and duplicate samples to insure the accuracy of all required analytical results shall be maintained by the permittee or designated commercial laboratory.*

Findings for Self – Monitoring:

The Permittee failed to sample and analyze during their last discharge in September 2015. The permittee should have sampled for: Flow, Biochemical Oxygen Demand (BOD_5), Total Suspended Solids (TSS), E. coli bacteria, pH and Total Residual Chlorine (TRC). The permittee also failed to take influent samples to calculate the Total Percent Removal requirement for both BOD_5 and TSS.

The Permittee has also failed to sample and analyze their 24-hour composite samples for Whole Effluent Toxicity (WET). The permit requires that analyses be done once every six months for WET.

Section F – Flow Measurement – Overall Rating of "Unsatisfactory"

The permit requires in Part III, Section C. 6 Flow Measurement:

> *Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated, and maintained to insure that the accuracy of the measurements is consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than 10% from true discharge rates throughout the range of expected discharge volumes.*

Findings for Flow Measurement:

Previous inspection reports state that the effluent Parshall flume is a 6" inch flume. If this is so, the flume is inadequately sized for this facility. Design capacity for this facility 0.0083 MGD. The lowest head (ft.) that a 6" Parshall flume can measure is approximately 0.10.

The facility is not measuring flows with a maximum deviation of less than 10% from true discharge rates as required by the permit.

The vegetation is completely overgrown over the Parshall flume and the inspectors were unable to verify the size of the flume. The operator did state that there is no staff gauge attached to the Parshall flume. Because of this, the facility has no way of accurately measuring the discharge flow. The operator did sampling for their WET test in 2013 for their previous permit. The inspector reviewed the flow data provided for the 2013 WET test. The inspector believes that the flow provided may have been taken from the influent Parshall flume, but this was not verified at the time of the inspection. The flows are constantly 0.018 MGD on the WET testing analysis. The influent Parshall flume is approximately 2-4". The inspector has never seen a "constant" flow over a 24 hour period of time. Usually, there will be peaks during the day when there is activity and then lower flow during the evening when there is no activity.

Section F – Laboratory – Overall Rating of "Unsatisfactory"

In Part III, Section C. 5, Monitoring Procedures:

> *An adequate analytical quality control program, including analyses of sufficient standards, spikes, and duplicate samples to insure the accuracy of all required analytical results shall be maintained by the permittee or designated commercial laboratory.*

Findings for Laboratory:

The permittee does not have an adequate quality control program. They do not do duplicate, spike or standard samples to insure accuracy of analytical results. The permittee does not have satisfactory calibration of either their pH or chlorine meter.

Section G – Effluent / Receiving Waters Observations – Overall Rating of "Not – evaluated"

The inspectors were unable to observe the effluent / receiving waters due to overgrowth of vegetation. Please see above for "operation and maintenance".

Section H – Sludge Disposal – Overall Rating of "Unsatisfactory"

The permit requires in Part III, B.3 Proper Operation and Maintenance:

> *The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by permittee as efficiently as possible in a manner which will minimize upsets and discharges of excessive pollutants and in will achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of this permit.*

Findings for Sludge Disposal:

The lagoons are loaded with sludge. There appears to be little capacity for treatment. The sludge has never been dredged from the lagoons. This is, again, a **repeat** finding from previous inspection reports.

NMED/SWQB
Official Photograph Log
Photo # 1

Photographer: Daniel Valenta	Date: July 7, 2016	Time: 1424 Hours
City/County: Village of Cimarron, Colfax County		State: New Mexico
Location: Village of Cimarron Wastewater Treatment Lagoons		
Subject: One of two Lagoons – Floatable solids, indicating advanced age of solids.		

NMED/SWQB
Official Photograph Log
Photo # 2

Photographer: Daniel Valenta	Date: July 7, 2016	Time: 1440 Hours
City/County: Village of Cimarron / Colfax County		State: New Mexico
Location: Village of Cimarron Wastewater Treatment Lagoons		
Subject: Overgrown vegetation between the two lagoons		

NMED/SWQB
Official Photograph Log
Photo # 3

Photographer: Daniel Valenta	Date: July 7, 2016	Time: 1445 Hours
City/County: Village of Cimarron / Colfax County		State: New Mexico
Location: Village of Cimarron Wastewater Treatment Lagoons		
Subject: Discharge outfall – overgrown vegetation – only slightly visible.